

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

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MAY 15 2013

Famikia M. Savage

CLERK, U.S. DIST. COURT  
WESTERN DIST. OF TENN

\_\_\_\_\_  
(Name of plaintiff or plaintiffs)

v.

CIVIL ACTION NO. \_\_\_\_\_

Security Finance Loan  
and Tax company

\_\_\_\_\_  
(Name of defendant or defendants)

**COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964**

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).

2. Plaintiff, Famikia Savage  
(name of plaintiff)

is a citizen of the United States and resides at 6629 Eastbrooks Lane Apt 1  
(street address)

Memphis USA TN  
(city) (country) (state)

38134 601-431-3785  
(zip code) (telephone number)

3. Defendant Security Finance Loan + Tax Company  
(defendant's name)

lives at, or its business is located at P.O. Box 811

Spartanburg, SC 29304  
(street address)

4. Plaintiff sought employment from the defendant or was employed by the defendant at

729 Highway 51 N  
(street address)

Livingston USA TN 38019  
(city) (country) (state) (zip code)

5. Defendant discriminated against plaintiff in the manner indicated in paragraph 9 of this complaint on or about MARCH 2012

(day) (month) (year)

6. Defendant filed charges against the defendant with the Tennessee Fair Employment Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about \_\_\_\_\_

(day) (month) (year)

7. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about 19th APRIL 2012

(day) (month) (year)

8. The Equal Employment Opportunity Commission issued a Notice of Right to Sue, which was received by plaintiff on 21 February 2013. (Attach a copy of the notice to this complaint.)  
(day) (month) (year)

9. Because of plaintiff's (1) ☒ race, (2) \_\_\_ color, (3) \_\_\_ sex, (4) \_\_\_ religion, (5) \_\_\_ national origin, defendant

(a) \_\_\_ failed to employ plaintiff.

(b) \_\_\_ terminated plaintiff's employment.

(c) ☒ failed to promote plaintiff.

(d) \_\_\_

10. The circumstances under which defendant discriminated against plaintiff were as follows:

The defendant failed to promote the plaintiff on numerous occasions. Several promotional opportunities were given to caucasians over myself when applied for advanced opportunities within the organization.

11. The acts set forth in paragraph 9 of this complaint

- (a) ☐ are still being committed by defendant.  
(b) ☒ are no longer being committed by defendant.  
(c) ☐ may still be being committed by defendant.

12. Please attach to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission, which are submitted as a brief statement of the facts supporting this complaint.

WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

- (a) ☐ Defendant be directed to employ plaintiff, or  
(b) ☐ Defendant be directed to re-employ plaintiff, or  
(c) ☐ Defendant be directed to promote plaintiff, or;  
(d) ☒ Defendant be directed to pay damages and lost wages to the plaintiff.

and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

13. I would like to have my case tried by a jury. Yes (☒) No (☐)

Janikia M. Love  
SIGNATURE OF PLAINTIFF